

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES S. PAVLICHKO, SR.	:	
Plaintiff,	:	
	:	
and	:	
	:	
JAMES S. PAVLICHKO, JR.,	:	
A Minor Child	:	CIVIL ACTION #: 02-cv-02889
Plaintiff,	:	
	:	
vs.	:	
	:	
GLEN MILLS SCHOOL, <i>et al.</i>	:	
Defendants.	:	
	:	

**DECLARATION OF MATTHEW A. HAMERMESH
IN OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

I, Matthew A. Hamermesh, hereby declare as follows:

1. I am an attorney with the law firm of Hanglevich Aronchick Segal & Pudlin, and I represent Plaintiffs James Pavlichko, Sr. and James Pavlichko, Jr. in the above-captioned action.
2. Attached hereto are true and correct copies of the following documents:

Exhibit No.	Description
A.	Excerpts from Deposition of James Pavlichko, Jr., June 16, 2003
B.	Excerpts from Deposition of James Pavlichko, Sr., June 16, 2003
C.	Excerpts from Deposition of Thomas Green, July 23, 2003
D.	Excerpts from Deposition of Nelson Yanez, July 25, 2003
E.	Letter, James Pavlichko, Sr. to Superintendent/Director, April 16, 2002
F.	Third Comprehensive Report re: James Pavlichko, The Glen Mills School, June 12, 2002

- G.** Transcript of Placement Review Hearing, In re James Stephen Pavlichko, Jr, Court of Common Pleas, Luzerne County, June 17, 2002
- H.** Excerpt from Tyler Hall Unit Log, May 14, 2002
- I.** Excerpt from Tyler Hall Unit Log, June 16, 2002
- J.** Report, Department of Public Welfare, June 7, 2002
- K.** Excerpts from Student Handbook, Glen Mills Schools

I declare under the penalty of perjury and under the laws of the United States that the foregoing statements are true and correct to the best of my knowledge.

Dated: September 9, 2003

Matthew A. Hamermesh

CERTIFICATE OF SERVICE

I, Matthew A. Hamermesh, hereby certify that on September 9, 2003, I caused a true and correct copy of the foregoing Declaration of Matthew A. Hamermesh in Opposition to Defendants' Motion for Summary Judgment to be served on the following by overnight mail:

Edward M. Galang, Esquire
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Matthew A. Hamermesh